

AO 106 (Rev. 04/10) Application for a Search Warrant

AUSA Glenn-Applegate

FILED
 RICHARD W. NAGE
 CLERK OF COURT
 2020 JUN 30 PM 2:31

UNITED STATES DISTRICT COURT

for the
 Southern District of Ohio

In the Matter of the Search of

U.S. Postal Service Priority Mail parcel bearing label no. 9405
 5368 9784 6819 8795 14 addressed to "CARSON SMITH, 414
 GALLERY DR MARYSVILLE, OH 43040-8351".

Case No. 2:20-mj-459

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

U.S. Postal Service Priority Mail parcel bearing label no. 9405 5368 9784 6819 8795 14 addressed to "CARSON SMITH, 414
 GALLERY DR MARYSVILLE, OH 43040-8351".

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 USC 841(a)(1)

Offense Description

Possession with intent to distribute
 a controlled substance

21 USC 843(b)

Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector MOHAMED A. SABRAH

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[Signature]
 Applicant's signature

MOHAMED A. SABRAH, U.S. POSTAL INSPECTOR

Printed name and title

Sworn to before me and signed in my presence.

Date: June 30, 2020

City and state: Columbus, Ohio

[Signature]
 Elizabeth A. Preston Deavers
 United States Magistrate Judge

6/29/20
P.G.A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF:

U.S. Postal Service Priority Mail parcel bearing
label no. 9405 5368 9784 6819 8795 14
addressed to "CARSON SMITH, 414 GALLERY
DR MARYSVILLE, OH 43040-8351".

Case No. _____

CHIEF MAGISTRATE JUDGE DEEVERS

Affidavit in Support of Application for Search Warrant

I, MOHAMED A. SABRAH, DO HEREBY DEPOSE AND SAY:

1. I have been a U.S. Postal Inspector for the U.S. Postal Inspection Service (USPIS) since February, 2016, enforcing federal mail and drug laws; currently assigned to Columbus, OH. I have received training at U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local law enforcement units. I have received an additional 40 hour Prohibited Mailings training by the U.S. Postal Inspection Service.
2. I know from my training and experience, and the training and experience of other Postal Inspectors, I am aware the U.S. Mail is often used by drug traffickers to transport controlled substances as well as U.S. currency derived from their illicit activities, either as proceeds and/or payment. I know from my training and experience the Priority Mail system is commonly used to transport controlled substances and associated currency because Priority Mail provides traceability, reliability, and timely delivery. The guaranteed delivery timeframe of Priority Mail places time pressures on law enforcement agents to identify, search, and deliver these drug parcels in a timely manner.
3. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail network. Inspectors routinely review shipment documents and Priority Mail packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.
4. On June 17, 2020, Detectives from the Union County Sheriff's office contacted the Columbus, OH Postal Inspectors after learning that Carson Smith, a subject of their drug investigation, may have mailed Express parcel EE306958252US to California, which they believe contained currency.
5. On June 19, 2020, Inspectors secured warrant # 20-mj-431, from the Southern District of Ohio, for parcel EE306958252US. Parcel EE306958252US was addressed to "Gerard Bun, 2168 S. Atlantic Blvd PMB# 351 Monterey Park, CA 91754" and bearing the return address of "414 Gallery Drive Marysville, OH 43040, Carson Smith." Parcel EE306958252US was found to contain \$2,250.00 USD and a note that read "Carson Smith, 29892 State Route 37 Richwood, Ohio 43344, Order: unit GG4M, Snap:

csmith005, contact 330-240-6911". On the same day, the contents of parcel EE306958252US were repackaged into the original packaging and placed back into the mail stream.

6. On June 26, 2020, based on the facts above, law enforcement identified a U.S. Postal Service Priority Mail parcel bearing label no. 9405 5368 9784 6819 8795 14, which was believed to contain narcotics, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance) and 843(b) (illegal use of mail in furtherance of narcotics trafficking). Inspectors identified this as a suspected drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, recipient, and size.
7. On June 29, 2020, Postal Inspectors took custody of U.S. Postal Service Priority Mail parcel bearing label no. 9405 5368 9784 6819 8795 14, addressed to "CARSON SMITH, 414 GALLERY DR MARYSVILLE, OH 43040-8351", with a return address of "JOHN WANG, 447 CLINTWOOD AVE LA PUENTA, CA 91744". The subject parcel is further described as a white and red U.S. Postal Service Priority Mail large flat rate box, measuring 12 x 12 x 6 with electronic postage affixed. The subject parcel was mailed on June 25, 2020, from the City of Industry, CA Post Office 91715 with a pre-paid postage label affixed.
8. Your affiant ran both the return and recipient addresses in CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information.
9. According to CLEAR, the return address 447 CLINTWOOD AVE LA PUENTA, CA 91744, does exist, but John Wang cannot be associated as a resident.
10. According to CLEAR, the recipient address 414 GALLERY DR MARYSVILLE, OH 43040-8351, does exist, and Carson Smith can be associated as a resident.
11. Your affiant knows that in the past, drug traffickers have used addresses belonging to others for the sender/return address, to ship parcels containing illegal narcotics, in an attempt to legitimize and distance themselves from the shipment in the event that the parcel is seized by law enforcement officers. Additionally, California is a known source area for shipment of illegal narcotics to Central Ohio as well as other areas of the United States.
12. I know from my training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, for which narcotic-sniffing canines are trained to indicate alert, on the box, contents of the box, and/or other packaging material they handle.
13. On June 29, 2020, Postal Inspectors contacted Officer David Jones, Columbus Police Department, who is the handler for "Ayko", a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, "crack", heroin, methamphetamine, and their derivatives. K-9 "Ayko" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Ayko" has successfully detected narcotics, demonstrating clear, positive, aggressive alerts, and establishing himself as a highly reliable police dog.

14. The subject parcel was hidden among other packages, and "Ayko" was allowed to search the entire area. Officer Jones concluded that K-9 "Ayko" did alert positively to U. S. Postal Service Mail parcel bearing label number 9405 5368 9784 6819 8795 14. Based on that alert, Officer Jones concluded that the odor of one of the drugs that K-9 "Ayko" is trained and certified to detect was present.
15. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Mail parcel bearing tracking number 9405 5368 9784 6819 8795 14, addressed to "CARSON SMITH, 414 GALLERY DR MARYSVILLE, OH 43040-8351" contains controlled substances, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).



Mohamed Sabrah
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 30th day of June, 2020 at Columbus, Ohio.


Elizabeth A. Preston Deavers
United States Magistrate Judge